

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED

FEB 14 2020

TONY R. MOORE, CLERK
DEPUTY

page 1 of 5

Western District of Louisiana/
United States District Court
Parish of Ouachita/Monroe Division

BY United States

Date Filed:

V/S

Christopher Joe Stamper Docket No:

18 U.S.C. § 2252A(a)(2)(A)

Criminal Number: 3:19-cr-00033-01

JUDGE DOUGHTY

S/

MAGISTRATE HAYES

Clerk of Court

MOTION TO REQUEST AND MOTION
FOR DISCOVERY, DISCLOSURE AND INSPECTION
AND FOR A BILL OF PARTICULARS.

①

Defendant is presently charged with
committing the crime of:

- ① COERCION AND ENTICEMENT
- ② RECEIPT OF CHILD PORNOGRAPHY
- ③ POSSESSION OF CHILD PORNOGRAPHY
- TWO COUNTS

- ④ FIVE COUNTS OF RECEIPT OF CHILD
PORNOGRAPHY - STATE OF LA.

but for the lack of information is
unable to properly prepare his defense;
and therefore, by Counsel, requests
the United States to voluntarily disclose
the materials specified below, and also
moves the Court to order the disclosure
of such materials as are not
voluntarily disclosed by the United States
and State of LA.

(2)

Page 2 of 5

This request and motion is made in accordance with Louisiana Code of Criminal procedure, Art. 716, et. Seq., and the ABA Project on Standards for Criminal Justice - Standards relating to Discovery and procedure before Trial; and in exercise of defendants rights to due process and equal protection of the laws, Confrontation, and effective assistance of Counsel under the Fifth, Sixth and Fourteenth Amendments to the United States Constitution, and under the corresponding provisions of the Louisiana Constitution as used in this request and motion for discovery.

(3)

"Disclose" means to deliver to or to produce and permit undersigned counsel to inspect, copy, and analyze each item in the custody or control of the United States, and the State of Louisiana or to which the United States and the State of Louisiana has access through any agency of the Criminal Justice System.

(4)

"Statements" include all descriptions and assertion of fact or opinion in any form, including but not limited to Verbal numerical, graphic, pictorial, and demonstrative form.

(5)

page 3 of 5

"Written Statements" include all writing, transcriptions, paraphrases, summaries, notes and numerical, graphic, pictorial, or demonstrative descriptions of statements whether signed or unsigned, all written materials but not limited to records and reports prepared by law enforcement and prosecuting authorities, their representatives and all professional personnel and all recordings and real or physical objects, reflecting or used in any assessment of the veracity or reliability of statements by polygraph or any other means, and all reproductions thereof.

(6)

"Oral Statements" include all oral statements, stenographically, mechanically, or manually, recorded or not recorded.

(7)

"Records and Reports" whether formal or informal written or recorded and all notes, notations or memoranda, or is used inclusively.

(8)

"Law Enforcement" authority includes every municipal police Department, every Parish Sheriff's department, The LA. Dept. of public safety, The Federal Bureau of Investigations, and every other city, County, Parish, state, Federal, or military agency having responsibilities for criminal law enforcement or criminal investigations and the successors of each.

page 4 of 5

"United States Attorney" includes the U.S. Attorney, his/her office, every Assistant U.S. Attorney, and every other representative of that office who has had or has responsibility for preparing or presenting matters connected with the prosecution of this case, and the successors of each.

"Alleged Crime" includes the offense charged in the indictment, all lesser included offenses, and all offenses that may subsequently be charged against the defendant in connection with the events giving rise to the indictment, together with their lesser included offenses.

"The Statute"

- ② Upon what Statute or Statutes is this prosecution based?
- ③ Does the United States and or State of Louisiana allege and intend to prove any physical and or sexual act or acts on the part of the defendant as being the crime or part of the crimes?
- ④ If the answer to "B" above is yes then the number of acts, describe each act, and the place where each act took place.

(12)

page 5 of 5

Defendant moves the Court to order the United States to produce all handwritten or transcribed notes of the investigating officer or any other officer where in the description of the alleged perpetrator was reduced to writing and filed or any other file, including but not limited to the personal notes of any officer receiving such description, and any other exculpatory assertion, descriptions, or comments which may exist in such notes or files.

Brady ~~vs~~ Maryland 373, U.S. 83, S. Ct. 1194

(13)

Defendant prays this Court will grant this motion and order that any and all documents be sent directly to defendant due to his current Counsel Walter Caldwell deliberately withholding necessary documents defendant needs to properly prepare for his defense.

Respectfully Submitted

~~Christina~~ Joe Stamps

pro se